

# Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc.  
Pursuant to The Honorable Judge Victor Marrero of the  
United States District Court, Southern District of New York

322 Eighth Avenue Suite 1704 New York, NY 10001 (212) 523 – 0686 rseiden@seidenlawgroup.com

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## VIA ECF

Hon. Victor Marrero  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

February 10, 2023

Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Judge Marrero,

I write to provide the Court with a further status update. In my January 9, 2023 letter to the Court (ECF 382), I indicated that Link Motion Inc.'s ("LKM") registered agent in the Cayman Islands had informed my office that if its invoice was not paid, LKM would be no longer be in good standing. On January 20, 2023 (ECF 390), Your Honor directed the Receiver "to advise the Court if it receives a notice from the Cayman Islands Registrar" regarding whether LKM is in good standing.

On February 10, 2023, the Receiver received an email from Maples and Calder Service Europe Limited ("Maples"), LKM's registered agent in the Cayman Islands. In its email, Maples indicated that "***[LKM] is no longer in good standing***" because it failed to pay the Maple Invoice,<sup>1</sup> which became due on January 31, 2023.<sup>2</sup> Maples further indicated that in order to ensure that LKM "can be restored to good standing[,] LKM must pay the Maples Invoice "without further delay and, in any event, by no later than Friday **February 24, 2023**."

Given that there are no funds available to the Receivership, the Receiver is unable to pay the Maples Invoice. Further, in light of the Court's order requiring the Receiver to preserve the "status quo" (ECF 331), my office has not taken any actions in response to the Maples Invoice other than to inform Maples that the Receiver is required to preserve the "status quo" and has no funds in its estate. As such, I will follow the Court's guidance as to actions that the Receiver should take (if any) in light of the Court's order and the best interests of LKM.

Please do not hesitate to contact me via email or telephone if your Honor wishes to discuss this matter in further detail.

cc: All Parties (via ECF)



Robert W. Seiden, Esq.  
Court-Appointed Temporary Receiver for Link  
Motion Inc.

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<sup>1</sup> The term "Maples Invoice" refers to a Maples invoice to LKM in the amount of \$3,219.51.

<sup>2</sup> The copies of the emails with Maples Invoice are attached as Exhibit A to this letter.